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February 9, 2018

VIA ECF

Hon. Sarah Netburn
United States Magistrate Judge
Southern District of New York
40 Foley Square, Room 430
New York, NY 10007

**Re: Agreed request for a sixty-day extension of the discovery deadline.
Pablo Molgora v. Sharinn & Lipshie, P.C., et al, Case No. 1:17-cv-03766-
KBF**

Dear Judge Netburn:

The undersigned represents Plaintiff in this case for violations of the Fair Debt Collections Act ("FDCPA"), the Fair Credit Reporting Act ("FCRA"), and N.Y. General Business Law.

The parties request that the discovery deadline be extended by sixty days, from March 31, 2018 to May 30, 2018. This is the second request for an extension of this deadline. The discovery deadline was originally set for January 12, 2018. During a November 27, 2017 conference, Your Honor issued an order extending discovery to March 31, 2018.

The parties have been engaged in discovery since late October, 2018. Although Plaintiff served her first notice of deposition on October 31, 2017, none of the depositions have taken place due to Defendants' scheduling issues.¹ An extension of the deadline would provide much needed breathing room as the parties attempt to schedule depositions. Plaintiff anticipates serving discovery requests based on the depositions, and therefore requires the depositions to be scheduled no later than thirty days prior to the discovery deadline.

Moreover, a discovery extension is necessary due to the new posture of the case given S&L's February 8, 2018 Suggestion of Bankruptcy. DE 53. Counsel for S&L informs me that he is conferring with his clients and with S&L's bankruptcy attorney in order to determine the scope and terms for his continued representation of the S&L Defendants.

This is an agreed request for an extension. The parties request that the discovery deadline be extended by sixty days, from March 31, 2018 to May 30, 2018. The requested extension will not affect any other deadlines in this action.

¹ Defendant Harvey Sharinn spends much of the winter travelling in Florida, complicating efforts to coordinate his deposition.

Respectfully submitted,

/s/

Ahmad Keshavarz